

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA
TULSA DIVISION**

IN RE:)	
)	
Sanctuary Evangelistic Church, Inc.)	No. 12-12616
)	Chapter 11
)	
DEBTOR)	

**APPLICATION BY DEBTOR
FOR EMPLOYMENT OF ATTORNEY**

COMES NOW, Sanctuary Evangelistic Church, Inc., Debtor, by and through their attorney, Jerry L. Gunter of Winters & King, Inc., and would show to the court:

1. This case was filed on 9/24/2012, under Chapter 11.
2. The Debtor has continued in possession of its property.
3. Debtor, as Debtor-in-Possession, wishes to employ Jerry L. Gunter of the law firm, Winters & King, Inc. ("Attorneys"), Attorneys duly admitted to practice in this Court.
4. The applicant selected Attorneys for their knowledge and experience in bankruptcy law and non profit entity law and believe that Attorneys are well qualified to represent Debtor-in-Possession in this proceeding..
5. Jerry L. Gunter has been admitted to practice in this Court, has knowledge and experience in bankruptcy issues in chapters 7 and 13 and has requested Mark A. Craig mentor him in this chapter 11 case. Mr. Craig has agreed.
6. The professional services that said attorneys will render are:
 - (a) Prepare all necessary pleadings, with respect to the chapter 11 case including but not limited to applications, answers, orders Disclosure Statement and Plan of Reorganization;
 - (b) Advise and assist the Debtor with respect to its rights and obligations as Debtor-in-Possession and in management of its property;
 - (c) Perform any and all other legal services for the Debtor which may be necessary herein: and is necessary for Debtor to employ an attorney for such professional services;
7. To the best of Debtor's knowledge, said Attorneys have no connection with the creditors, or any other party in interest, or their respective attorneys insofar as

the claims and other matters in this case are concerned. The form was paid \$8,000.00 retainer pre-petition. As of the filing date, Attorneys billed and collected fees for work preliminary to the filing of this case in the amount of \$2,281.50. Attorneys also paid \$1,048.00 for the filing fee out of the retainer. As of petition date, the remaining retainer in this case had a balance of \$4,674.50. As of the petition date, no fees or expenses were owing to the firm.

8. the terms of employment of Attorneys agreed to by the Debtor, subject to approval of the Court, are that Attorneys will undertake this representation at their standard hourly rates. The individual presently designated to represent the Debtor is, Jerry L. Gunter, and his hourly rate of \$195.00 per hour. The hourly rate is subject to periodic adjustments to reflect economic and other conditions.

9. Attorneys represent no interest adverse to Debtor as Debtor-in-Possession or the Estate in the matters upon which they are to be engaged for the Debtor and their employment would be to the best interest of this Estate.

WHEREFORE, Debtor prays that the Jerry L. Gunter and the law firm of Winters & King, Inc., under the terms specific to represent it as Debtor in Possession in this case under Chapter 11 of the Bankruptcy Code be approved by this Court, and for such other and further relief as is just and proper.

Respectfully Submitted,

/s/Jerry L. Gunter
Jerry L. Gunter, OBA #17041
Winters & King, Inc.
2448 East 81st Street, Suite 5900
Tulsa, OK 74137-4259
Ph: (918) 494-6868
FAX: (918) 491-6297
jgunter@wintersking.com

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA
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IN RE:

Sanctuary Evangelistic Church, Inc.

DEBTOR(S)

)
)
) No. 12-12616

) Chapter 11
)

**DECLARATION UNDER PENALTY OF PERJURY
BY PROPOSED ATTORNEY**

I, Jerry L. Gunter, hereby declare under penalty of perjury that:


1. I am an attorney duly admitted to practice law in the State of Oklahoma and in this Court.

2. I maintain an office for the practice of law at 2448 East 81st Street, Suite 5900, Tulsa, OK 74137-4259 under the firm name of Winters & King, Inc..

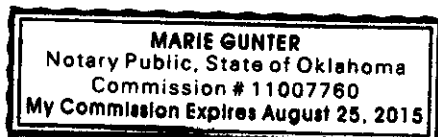
3. The firm no connection with the any of the Debtors' creditors, or any other party in interest in this case, or with any of their respective attorneys or accountants, or the United States Trustee, or any person employed in the office of the United States Trustee.

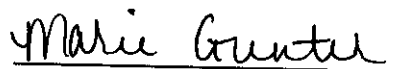
4. I represent no interest adverse to the above named Debtors.

Signed this 25 day of Sept., 2012.


/s/ Jerry L. Gunter
Jerry L. Gunter, OBA #17041
Winters, King & Beirute, Inc.
2448 East 81st Street, Suite 5900
Tulsa, OK 74137-4259
918- 494-6868; FAX: 491-6297
jgunter@wintersking.com

Subscribed and Sworn to before me this 25th day of September, 2012.




Notary Public

My Commission Expires: August 25, 2015
My Commission No.: 11007760